EXHIBIT 1

News Plaintiffs' Custodial 30(b)(6) Deposition Topics

1. For each custodian requested by News Plaintiffs, identification of the sources of information and documents that You searched for responsive documents, including email accounts, phone numbers, messaging platforms, and social media accounts.

2. The process by which You went about investigating the existence of documents responsive to News Plaintiffs' Requests for Production and information responsive to News Plaintiffs' Requests for Inspection, including identification of the locations searched for responsive documents and information.

3. Any document preservation notices that Defendants drafted or sent related to the News Cases or the use of the News Plaintiffs' content, including the timing of these notices, the scope of them, and the recipients.

4. Identification of all programs and platforms Your employees have used to communicate about issues relevant to this case.

5. Identification of all repositories that contain or contained documents and information responsive to the requests for production and requests for inspection issued by News Plaintiffs, including repositories where technical documentation, training data, output data, and source code, is or has been stored, as well as the extent to which separate repositories exist for the distinct OpenAI entities named as Defendants.

6. Identification of all platforms used for sharing of or collaboration on documents between OpenAI and Microsoft, as well as any repositories in which documentation of meetings or technical collaborations between Microsoft and OpenAI are or have been stored.

7. Your policies and practices regarding the retention and deletion of documents and other information, as applied to current and former employees, as well as to non-custodial sources of information.

8. Your policies and practices regarding the use of personal electronic devices for work purposes.

9. Whether and the extent to which any custodial documents have been deleted or otherwise disposed of, including text messages on personal devices and messages sent through social media accounts.

10. The existence, organization, preservation, storage, and deletion of Training Data, including all training datasets containing Journalism content, as well as the identification of tools used to acquire and process Training Data.

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11. The existence, organization, preservation, storage, and deletion of documentation concerning the processes You used to train the Text Generation AI Models, including all pre-training, post-training, and fine-tuning processes.

12. The existence, organization, preservation, storage, and deletion of documentation concerning Generative AI Products and Services, including all source code, production pipeline documentation, and product documentation as applied to all versions and updates of Generative AI Products and Services.

13. The existence, organization, preservation, storage, and deletion of documentation concerning the development of and planning for future products and services that include a Text Generation AI Model.

14. The existence, organization, preservation, storage, and deletion of documentation concerning the testing and evaluation of the Text Generation AI Models.

15. The existence, organization, preservation, storage, and deletion of output data reflecting user sessions on Your Generative AI Products and Services, as well as of reports on, metrics on, or analysis of such output data.

16. The meaning of data fields contained in sample output logs produced by Microsoft at MSFT_NEWS_000624874, MSFT_NEWS_000624875, and MSFT_NEWS_000624876, as well as of data fields contained in other output logs maintained by Defendants.

17. The existence, organization, preservation, storage, and deletion of reports on, metrics on, or analysis of user feedback from Your Generative AI Products and Services.

18. The existence, organization, preservation, storage, and deletion of all Text Generation AI Models, including all versions of the GPT-1, GPT-2, GPT-3, GPT-3.5, GPT-3.5 Turbo, GPT-4, GPT-4 Turbo, and GPT-4o family of models.